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December 22, 2014

Via Facsimile: (718) 613-2516

The Honorable Pamela Chen
225 Cadman Plaza East
Chambers N631
Brooklyn, NY 11201

RE: U.S. v. Michael Grimm
Case No.: 14-CR-00248

Dear Judge Chen:

As you are aware my office along with Attorney Jeffrey Neiman of the firm Marcus, Neiman & Rashbaum, LLP, represents Michael Grimm in connection with the charges contained within the above referenced indictment. As the Court is aware, a hearing is scheduled for December 23, 2014 at 1:00 p.m. Attorney Jeffrey Neiman will personally appear before the Court along with the Defendant. Counsel herein respectfully requests to appear at this hearing telephonically.

I have spoken with AUSA James Gatta and AUSA Anthony Capozzolo concerning this application. Mr. Gatta and Mr. Capozzolo have indicated that they have no objection to Counsel appearing telephonically.

Wherefore, it is respectfully requested that Counsel herein be granted permission to appear telephonically at the hearing which is scheduled for December 23, 2014 at 1:00 p.m.

Respectfully submitted,


Stuart N. Kaplan

SNK/jw
cc: AUSA Anthony Capozzolo
(Via E-mail: anthony.capozzolo@usdoj.gov)